

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C.**

In re Application of	)	
	)	
BUSTOS MEDIA HOLDINGS, LLC	)	File No. BNPFT-20171212AAF
	)	Facility ID #201738
For a Construction Permit for	)	
New FM Translator Station K260DK	)	
Portland, Oregon	)	

**PETITION FOR RECONSIDERATION**

Media Institute for Social Change ("MISC"), pursuant to 47 CFR §1.106 of the Commission's rules, hereby submits this Petition for Reconsideration to the above-identified application of Bustos Media Holdings, LLC ("Bustos") for a new FM translator station K260DK granted on February 1, 2018. The long form application submitted December 12, 2017 for this cross-service FM translator proposes to rebroadcast KOOR (AM) Milwaukie, Oregon onto channel 260, in Portland, Oregon.

MISC is the licensee of low power FM station KXRW-LP, Vancouver, Washington. KXRW-LP operates on channel 260 at a distance of 18.3 km away, co-channel to K260DK. The introduction of K260DK has induced a short-spacing arrangement under §73.807 for the LPFM facility. MISC is requesting reconsideration of the K260DK construction permit grant because it proposes to interfere with established listenership of KXRW-LP. While K260DK proposes no prohibited overlap of field strength contours with regard to §74.1204(a)(4), it does propose a situation that would cause interference to the regularly-used off-the-air signal of KXRW-LP,

which is prohibited by §74.1204(f). Furthermore, there are public interest and signal engineering reasons that side with rescinding the permit.

# **I. The Grant Of K260DK Conflicts With §74.1204(f).**

Section 74.1204(f) of the Commission's Rules states:

An application for an FM translator station will not be accepted for filing even though the proposed operation would not involve overlap of field strength contours with any other station, as set forth in paragraph (a) of this section, if the predicted 1 mV/m field strength contour of the FM translator station will overlap a populated area already receiving a regularly used, off-the-air signal of any authorized co-channel, first, second, or third adjacent channel broadcast station, including Class D (secondary) noncommercial educational FM stations and grant of the authorization will result in interference to the reception of such signal.

In order to provide convincing evidence under Section 74.1204(f) of the Commission's Rules that grant of a translator construction permit "will result in interference to the reception" of an existing FM facility, an opponent must provide, at a minimum:<sup>1</sup>

- (1) the name and specific address of each listener for which it claims credit;
- (2) some demonstration that the address of each purported listener falls within the 60 dBu contour of the proposed translator station;
- (3) some evidence, such as a declaration from each of the claimed listeners, that the person listens to the full-service station at the specified location; and
- (4) evidence that grant of the authorization will result in interference to the reception of the "desired" station at that location.

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<sup>1</sup> Refer to *The Association of Community Education, Inc.*, 19 FCC Red 12682, 12685-86 (2004).

Attachment A demonstrates the FCC 60 dBu (1 mV/m) contours of KXRW-LP and K260DK. The predicted 1 mV/m contour of K260DK and the 1 mV/m contour of KXRW-LP do not overlap. However, K260DK's designated service area usurps an area already receiving the regularly-used, off-air signal of KXRW-LP. Attachment B demonstrates KXRW-LP's Longley-Rice coverage around the K260DK 60 dBu contour. The propagation map demonstrates that KXRW-LP's broadcast extends into the city of Portland where the station retains a listenership base.

Attachment C introduces a map of ten listeners, with addresses listed, within the 1 mV/m contour of K260DK. Attachment I includes ten sworn declarations of both regular at home/work and mobile/commuting listeners of KXRW-LP that will receive interference within the 60 dBu of the operation of FM translator K260DK.

Attachment D also demonstrates additional listenership outside of the K260DK 60 dBu contour, with addresses listed, within Portland, Oregon and Vancouver, Washington. Using standard FCC co-channel ratio for interference and Longley-Rice propagation, these listeners are gauged to receive interference from the introduction of K260DK. Attachment I includes sworn declarations from those additional individuals.

Criteria (1) and (3) are supported by the statements in Attachment I along with the proximity map in Attachment B. These exhibits are statements given under the penalty of perjury from members of the public who identify themselves as regular listeners of KXRW-LP and who disclose their residence addresses. Attachment E demonstrates Criteria (4) that the

KXRW-LP signal would be drowned out by the translator's signal with a depiction of the Undesired to Desired signal.

## **II. Signal Viability of K260DK Is Questionable For Channel 260.**

The Commission has codified engineering methodologies to preserve the excellence of the FM band -- §73.509 for NCE facilities, §73.207 for commercial facilities, and §73.807 for LPFM facilities. Analogous protections for interference regarding translators is observed via §74.1204. However, §74.1204 offers a relaxed option for incoming interference. Taking account that terrain, ground cover, and other geographical inconsistencies, the FCC affords latitude when it comes to translator proposals prescribing service within interference contours of other FM facilities. However, the FCC has traditionally assumed proposals are judiciously conceived. Applications are not regularly scrutinized for signal viability with regard to degree of incoming interference to the proposed translator coverage (which would require a more qualitative propagation assessment). Nevertheless, this is a public interest issue when comparing the quality between current service and proposed service. MISC believes, in this case, the proposed translator would not serve in the public interest as it appears K260DK desecrates service to channel 260 within Portland more than it provides a viable service.

The 60 dBu contour of K260DK resides within the FCC 54 dBu F(50,10) interference contour of full power co-channel Class C0 station KRKT-FM Albany Oregon, as well as ~75% residing within the 40 dBu F(50,10) interference contour of co-channel KXRW-LP. Taking into consideration terrain, Longley-Rice interference propagation analysis reveals both KRKT-FM and KXRW-LP are stronger than 20db below K260DK signal within the proposed K260DK 60

dBu contour (see Attachment G). It is questionable whether the 8 watts K260DK prescribes offers any net benefit over the established services on channel 260 if it merely muddies FM band.

### **III. Local Community Radio Act Provides For Translator-LPFM Decisions To Be Based On The Needs Of The Local Community.**

The Local Community Radio Act states that decisions between LPFM and translators usage should be “made based on the needs of the local community.”<sup>2</sup> KXRW-LP’s charter relays an archetype for a quintessential public service:

KXRW is an independent, volunteer-based, values-driven, community-supported 501(c)3 non-profit organization that supports radio station KXRW-LP on 99.9FM. We are dedicated to delivering quality programming with an emphasis on local voices. We are committed to sharing knowledge and information to build a stronger community, based on inclusion, diversity and social justice in Southwest Washington and beyond.

Stations like KXRW-LP are a rare broadcast commodity, vastly outnumbered by commercial operations in the greater Portland, Oregon market. The community had rallied together with fundraisers to finance the permits, equipment, and labor for installation to make this broadcast platform possible. KXRW-LP has given the community a place where all voices can be heard. Public service programming like *The Common Good*, *Voices from The Community*, and the *Nonprofit Happy Hour* highlights community members doing good things, and the arduous work of numerous local nonprofits. KXRW-LP is developing a new program that will highlight our local musicians.

The contemplated usage for channel 260 here is either to retain the established signal of a community media asset, or annex a marginal-signaled cross-service FM translator for a

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<sup>2</sup> Refer to Section 5(2) of H.R. 6533 — 111th Congress: Local Community Radio Act of 2010.

commercial AM station. The latter is tantamount to a redundant service heard on two Portland radio channels. Furthermore, the scarcity of services like KXRW-LP are dwarfed in comparison to the number of commercial services. The “needs of the community” would seem to resonate with retaining the LPFM service.

#### **IV. Petition For Reconsideration Is Believed Appropriate.**

MISC believes this request for Reconsideration is appropriate given: (1) MISC only recently became privy to this translator proposal, as BNPFT-20171212AAF was accepted for filing the day after Christmas. The petitioning period was shorter than most filings -- 15 days. Although KXRW-LP monitored the local newspaper, *The Oregonian*, for public services notices for prior months, none was seen entered regarding a translator for 99.9 FM in Portland, Oregon. §73.3580 requires applicants for construction permits for new FM translator stations to provide local notice in a newspaper of general circulation in the community to which the station is licensed after applying. From what we are aware, the public notice was not run. (2) The labor-intensive process of retaining legal and engineering assistance while organizing a campaign to ascertain a sizable amount of listeners for signing declarations is not a trivial process. It would be a feat even for professional outfits to conclude within 15 days. (3) It is not unordinary for the Commission to consider a Petition for Reconsideration in the public interest despite not having participated in petitioning prior to a translator grant.<sup>3</sup>

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<sup>3</sup> See *R&S Media*, 19 FCC Red 6300, 6302 (2004), *Aspen FM, Inc.*, 12 FCC Red 17852 (1997); *Letter to Gary Smithwick*, 28 FCC Red 8929 (2013).

## **V. Conclusion.**

MISC asserts rescinding the grant of BNPFT-20171212AAF is justified, citing K260DF's conflict regarding §74.1204(f) and local public interest concerns.

Respectfully Submitted By,

A handwritten signature in black ink, appearing to read 'Phil Busse', written in a cursive style.

Phil Busse  
Executive Director  
Media Institute for Social Change

February 27, 2018

### **CERTIFICATE OF SERVICE**

I, Susan Galaviz, hereby certify that a copy of this Petition for Reconsideration was sent first class USPS February 28, 2018 to:

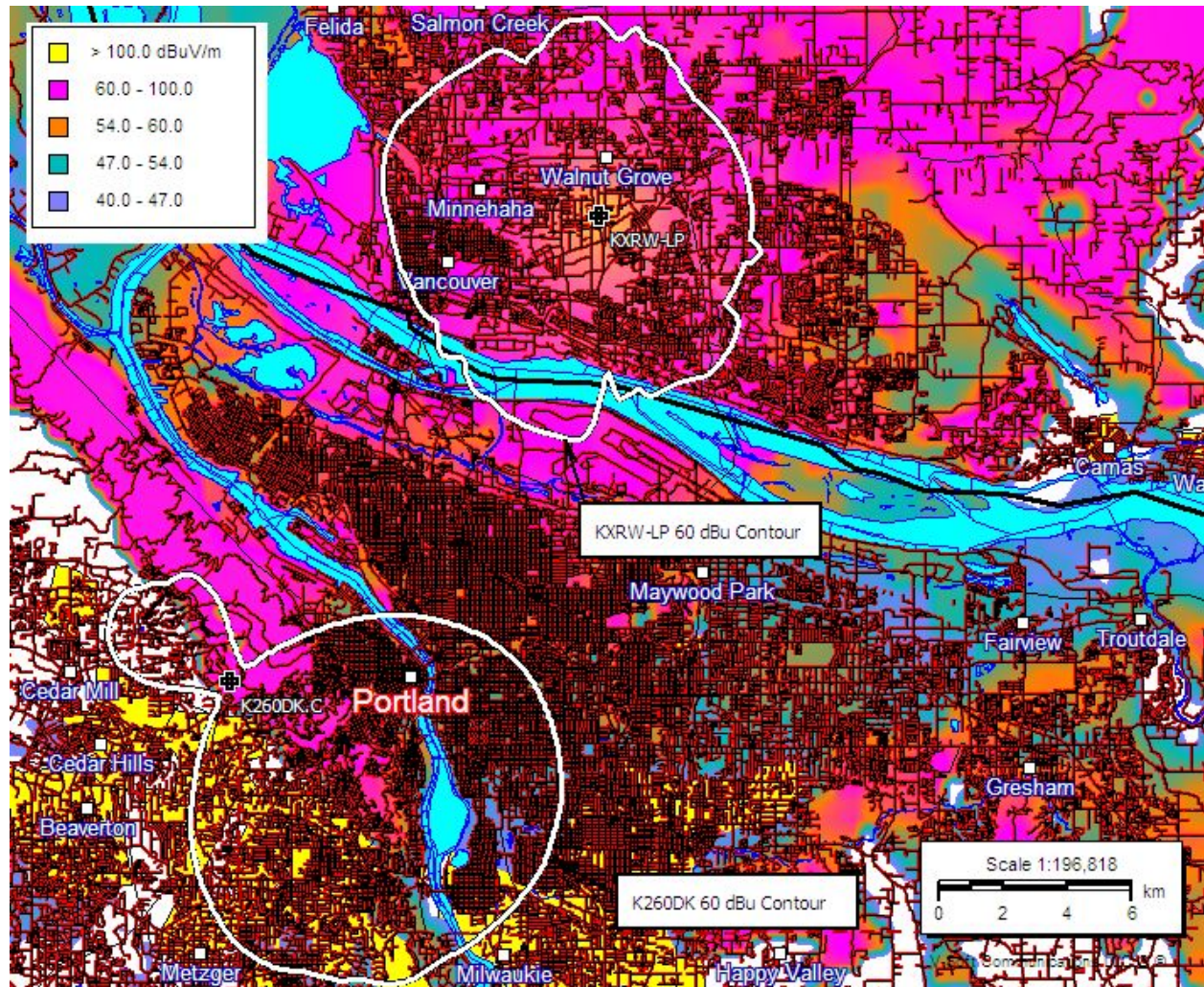
BUSTOS MEDIA HOLDINGS, LLC  
5110 S. E. STARK STREET  
PORTLAND OR 97215

Signed:

A handwritten signature in black ink, reading "Susan M. Galaviz". The signature is written in a cursive style with a large, looping initial "S" and a distinct "M" and "G".



**ATTACHMENT A: 60 dBu contours of KXRW-LP and K260DK (with KXRW-LP Longley-Rice propagation<sup>4</sup> overlaid)**

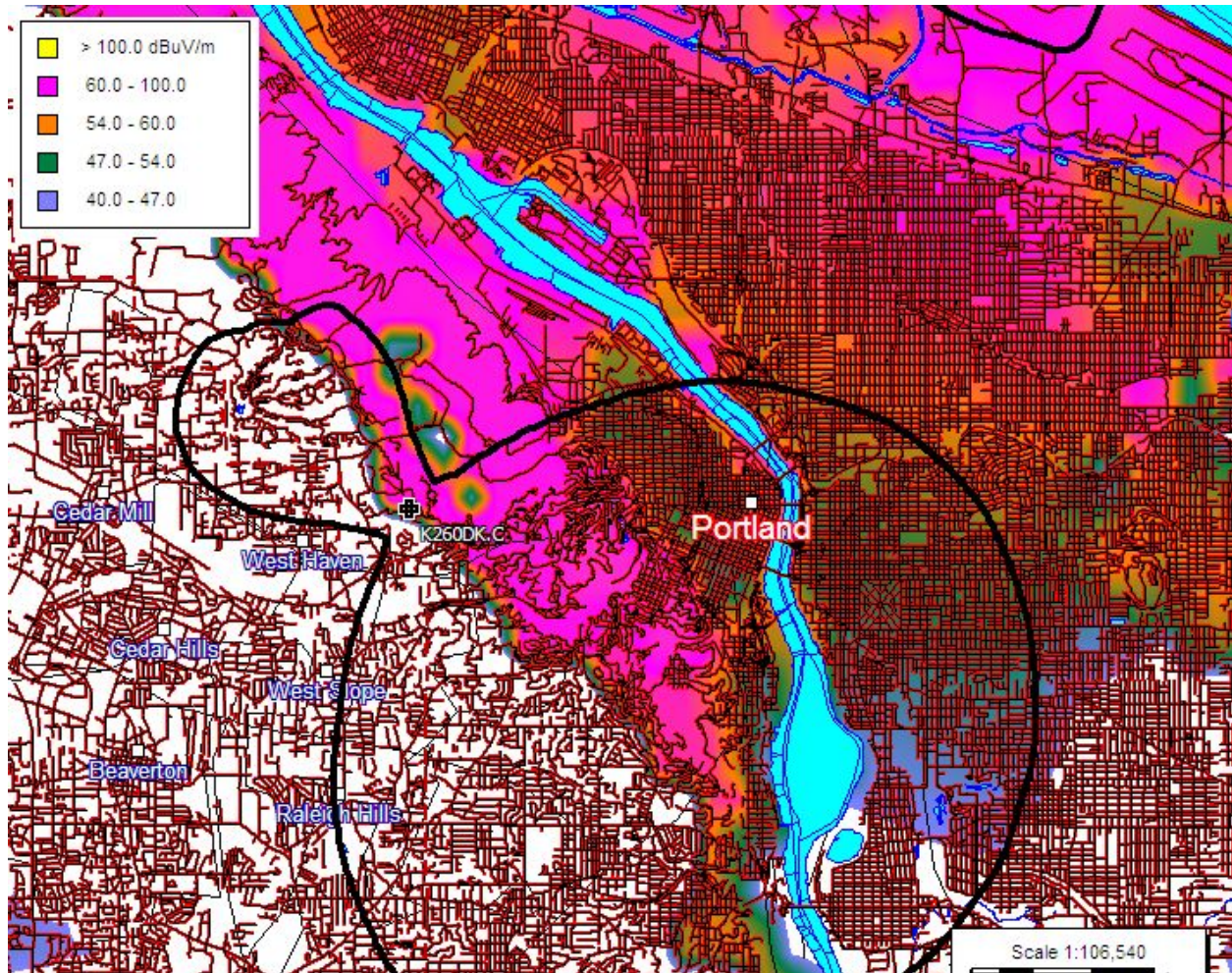


<sup>4</sup> See Attachment H for Longley-Rice Propagation Settings.



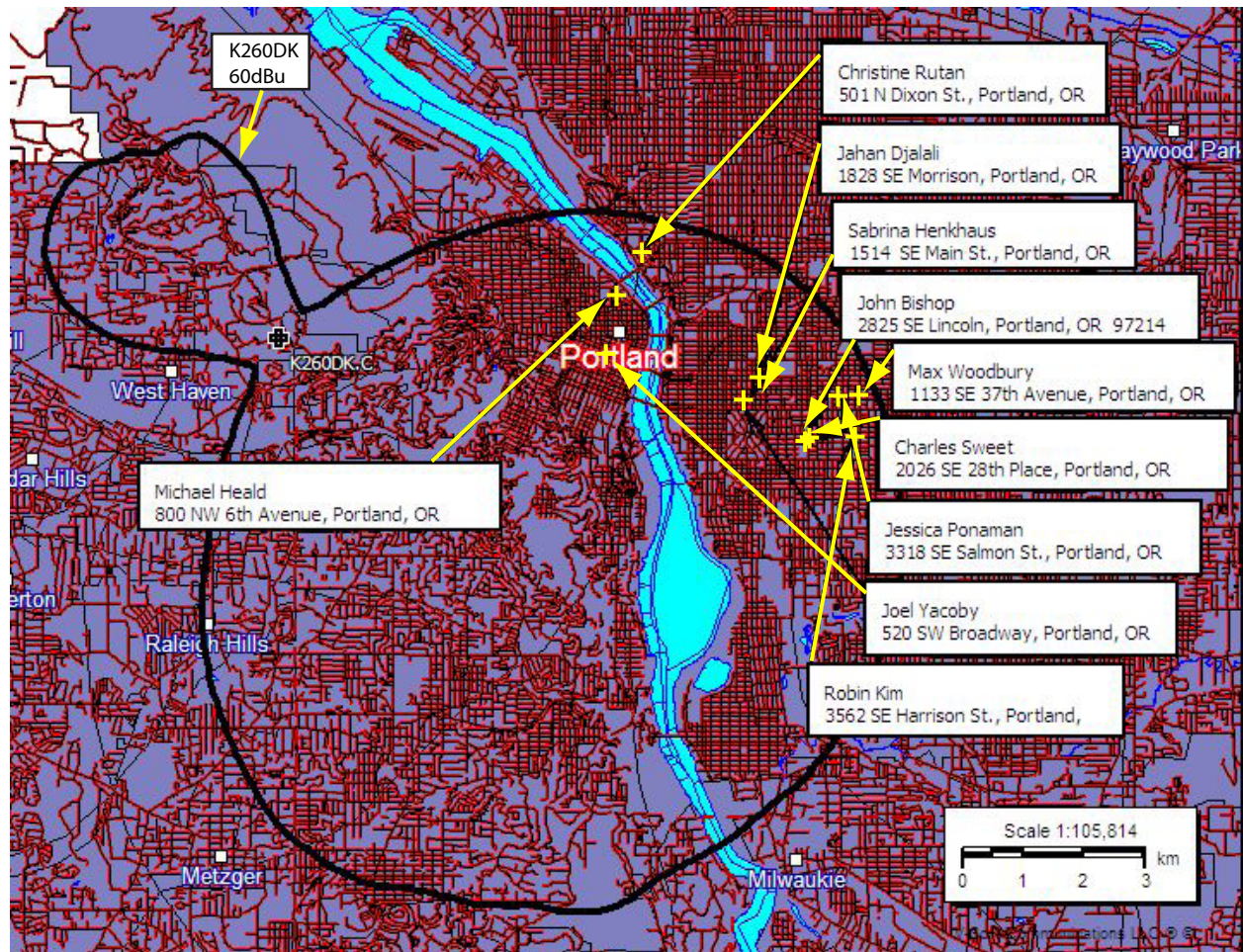
**ATTACHMENT B: Longley-Rice propagation map overlayed near K260DK 60 dBu contour to demonstrate established vicinity coverage.**

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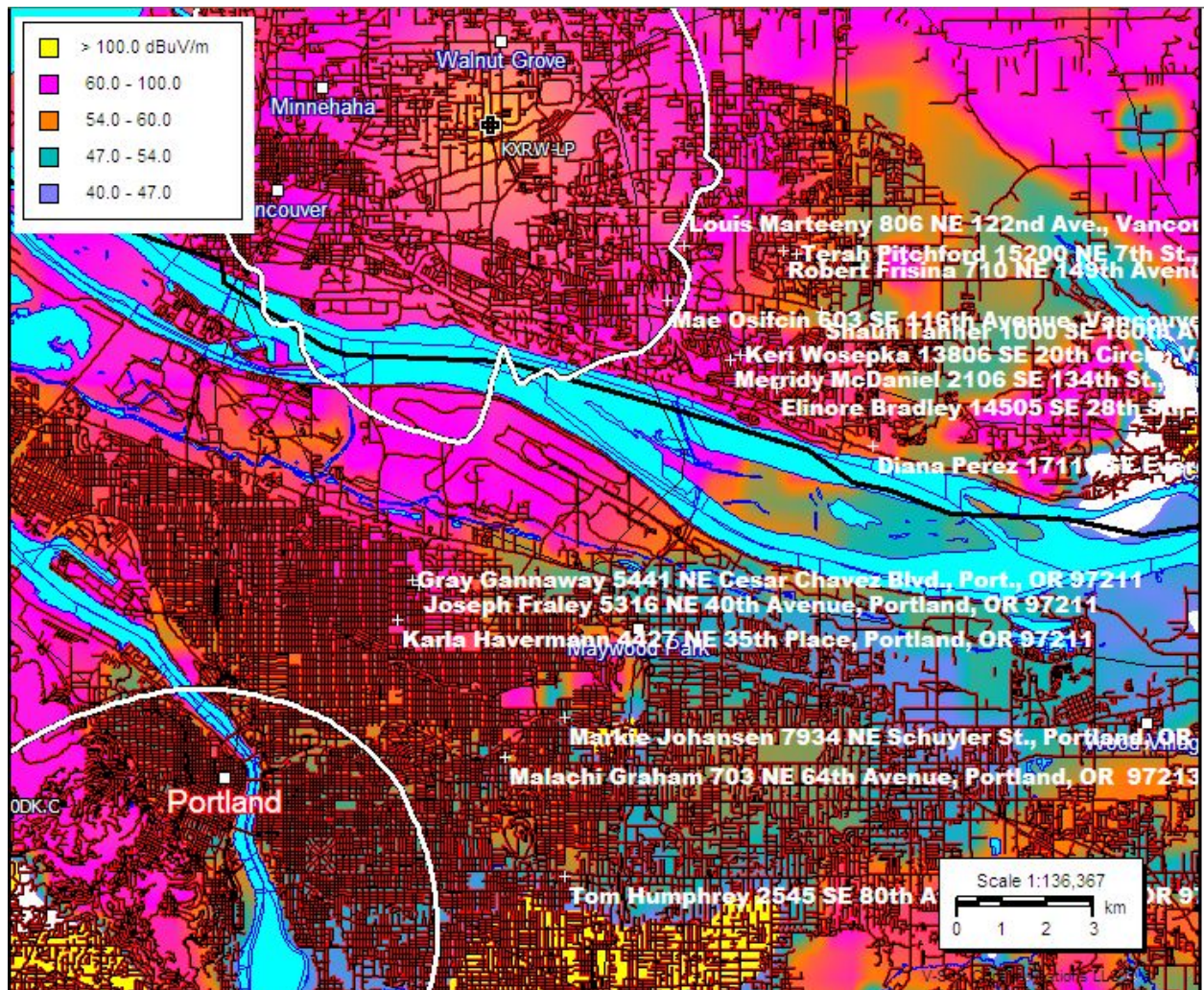


**ATTACHMENT C: Off-the-air listenership of ten persons within proposed K260DK 60 dBu  
FCC contour per Section 74.1204(f).**





**ATTACHMENT D: Other fringe listeners impacted by the introduction of K260DK.**

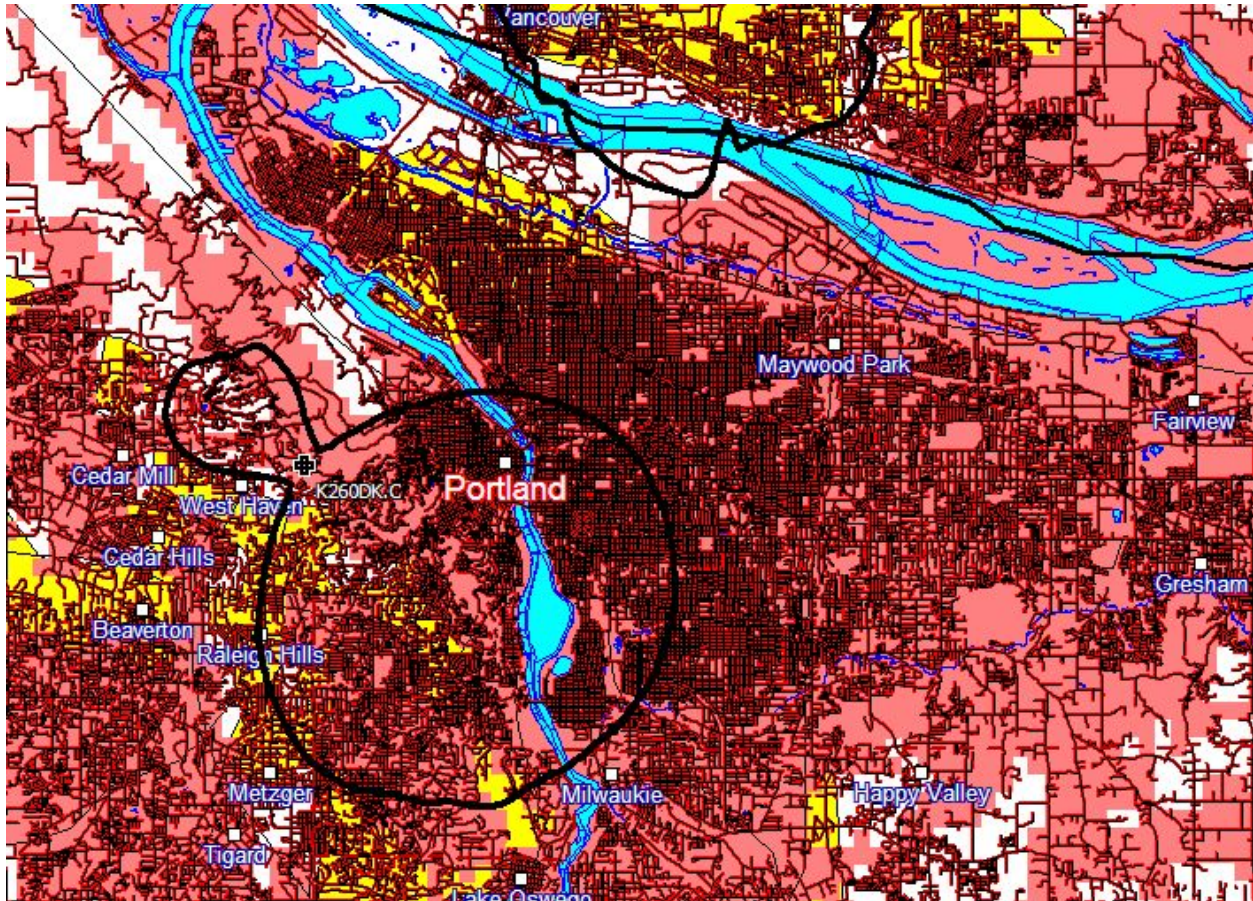


*Tick marks to the left of the name denote the location.*



**ATTACHMENT E: Interference area to KXRW-LP with the introduction of K260DK.**

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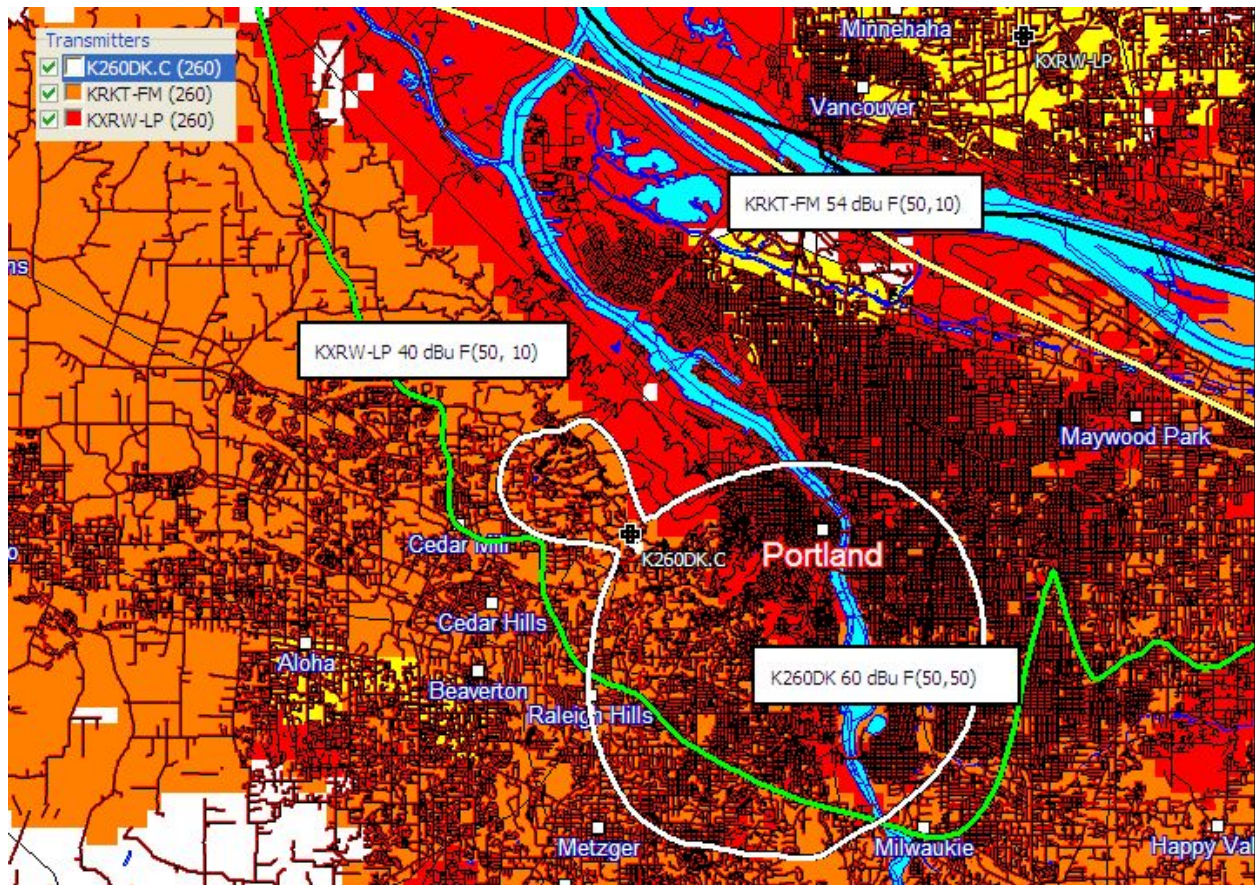
*Pink area demonstrates areas where the K260DK D/U is stronger than 20db below KXRW-LP signal.*

**ATTACHMENT F: Listeners listed on maps.**

Name	Address
<b><i>Within K260DK 60 dBu</i></b>	
John Bishop	2825 SE Lincoln, Portland, OR 97214
Charles Sweet	2026 SE 28th Place, Portland, OR 97214
Sabrina Henkhaus	1514 SE Main St., Portland, OR 97214
Jahan Djalali	1828 SE Morrison, Portland, OR 97214
Christine Rutan	501 N Dixon St., Portland, OR 97227
Max Woodbury	1133 SE 37th Avenue, Portland, OR 97214
Jessica Ponaman	3318 SE Salmon St., Portland, OR 97214
Joel Yacoby	520 SW Broadway, Portland, OR 97205
Robin Kim	3562 SE Harrison St., Portland, OR 97214
Michael Heald	800 NW 6th Avenue, Portland, OR 97209
<b><i>Portland Fringe</i></b>	
Malachi Graham	703 NE 64th Avenue, Portland, OR 97213
Karla Havermann	4427 NE 35th Place, Portland, OR 97211
Joseph Fraley	5316 NE 40th Avenue, Portland, OR 97211
Gray Gannaway	5441 NE Cesar Chavez Blvd., Port., OR 97211
Markie Johansen	7934 NE Schuyler St., Portland, OR 97213
Tom Humphrey	2545 SE 80th Avenue, Portland, OR 97206
<b><i>Vancouver Fringe</i></b>	
Shaun Tanner	1000 SE 160th Avenue, Vancouver, WA 98683
Diana Perez	17116 SE Evergreen Hwy, Vanc, WA 98683
Merridy McDaniel	2106 SE 134th St., Vancouver, WA 98683
Elinore Bradley	14505 SE 28th St., Vancouver, WA 98683
Louis Marteeny	806 NE 122nd Ave., Vancouver, WA 98684
Terah Pitchford	15200 NE 7th St., Vancouver, WA 98684
Robert Frisina	710 NE 149th Avenue., Vancouver, WA 98684
Mae Osifcin	603 SE 116th Avenue, Vancouver, WA 98683
Keri Wosepka	13806 SE 20th Circle, Vancouver, WA 98683



## ATTACHMENT G: Incoming co-channel interference to K260DF.



- Orange area demonstrates areas where the KRKT-FM D/U is stronger than 20db below K260DK signal.
- Red area demonstrates areas where the KXRW-LP D/U is stronger than 20db below K260DK signal.

White contour K260DK (60 dBu) is surpassed by:

- Green contour KXRW-LP 40 dBu F(50, 10) (~3/4th of the area).
- Yellow contour KRKT-FM 54 dBu F(50, 10) (all of the area).

## ATTACHMENT H: Longley-Rice Propagation Settings and Engineering Statement

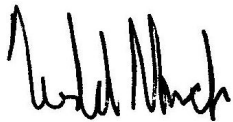
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### PROPAGATION SETTINGS

Prop Mode: Longley-Rice  
Climate: Cont temperate  
Conductivity: 0.0050  
Dielec Const: 15.0  
Refractivity: 311.0  
Receiver Ht AG: 9.1 m  
Receiver Gain: 0 dB  
Time Variability: 50%  
Sit. Variability: 50%  
ITM Mode: Broadcast

### TECHNICAL CONSULT CERTIFICATION

*I declare under penalty of perjury, that the technical content of the Petition and Attachments are true and accurate to the best of my knowledge and belief. I further certify over 10 years experience in submitting engineering exhibits before the FCC, 20 years performing broadcasting engineering work associated with radio facilities, a degree in Engineering from the University of California, Davis, and familiarity with FCC regulations.*



02/27/2018

Todd Urick  
todd@commonfrequency.org



## **ATTACHMENT I: Listener Declarations.**

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*See following pages.*

**Declaration**

I Sabrina Henckhaus do hereby declare, under penalty of perjury, that the following statements are true and correct.

I am a regular listener to KXRW-LP, Vancouver, WA on FM frequency 99.9. I usually listen to KXRW-LP at the following location:

1514 SE main Street Portland, OR 97214

I understand the FCC is considering the grant of an application for a new station on 99.9 in Portland, Oregon which could interfere with my ability to listen to KXRW-LP in the future.

I object to the operation of a new station which would interfere with KXRW-LP at my place of residence and/or in my car.

I have no personal or business connection with KXRW-LP or with Media Institute for Social Change (KXRW-LP licensee), nor connected with employees of KXRW-LP. I have no stake in the outcome of this proceeding. I am only concerned about another station causing interference with my ability to listen to the station in the future.

02/23/18

Date

Sabrina Henckhaus

Signature

1514 SE main St. Portland, OR 97214

Address

503-360-5204

Telephone Number

### ***Declaration***

I Max Woodbury do hereby declare, under penalty of perjury, that the following statements are true and correct.

I am a regular listener to KXRW-LP, Vancouver, WA on FM frequency 99.9. I usually listen to KXRW-LP at the following location:

1133 SE 37th Ave., Portland, OR 97214

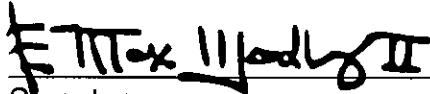
I understand the FCC is considering the grant of an application for a new station on 99.9 in Portland, Oregon which could interfere with my ability to listen to KXRW-LP in the future.

I object to the operation of a new station which would interfere with KXRW-LP at my place of residence and/or in my car.

I have no personal or business connection with KXRW-LP or with Media Institute for Social Change (KXRW-LP licensee), nor connected with employees of KXRW-LP. I have no stake in the outcome of this proceeding. I am only concerned about another station causing interference with my ability to listen to the station in the future.

February 22, 2018

Date



Signature

1133 SE 37th Ave, Portland, OR 97214

Address

(503)797-0096

Telephone Number

**Declaration**

I Jessica Boneman do hereby declare, under penalty of perjury, that the following statements are true and correct.

I am a regular listener to KXRW-LP, Vancouver, WA on FM frequency 99.9. I usually listen to KXRW-LP at the following location:

3318 SE Salmon St, Portland, OR 97214 3 while driving in my car.

I understand the FCC is considering the grant of an application for a new station on 99.9 in Portland, Oregon which could interfere with my ability to listen to KXRW-LP in the future.

I object to the operation of a new station which would interfere with KXRW-LP at my place of residence and/or in my car.

I have no personal or business connection with KXRW-LP or with Media Institute for Social Change (KXRW-LP licensee), nor connected with employees of KXRW-LP. I have no stake in the outcome of this proceeding. I am only concerned about another station causing interference with my ability to listen to the station in the future.

2/22/18

Date

J Boneman

Signature

3318 SE Salmon St, 97214

Address

858.945.8524

Telephone Number

### Declaration

I John Bishop do hereby declare, under penalty of perjury, that the following statements are true and correct.

I am a regular listener to KXRW-LP, Vancouver, WA on FM frequency 99.9. I usually listen to KXRW-LP at the following location:

CAR IN VARIOUS PORTLAND LOCATIONS IN SE, HOME

I understand the FCC is considering the grant of an application for a new station on 99.9 in Portland, Oregon which could interfere with my ability to listen to KXRW-LP in the future.

I object to the operation of a new station which would interfere with KXRW-LP at my place of residence and/or in my car.

I have no personal or business connection with KXRW-LP or with Media Institute for Social Change (KXRW-LP licensee), nor connected with employees of KXRW-LP. I have no stake in the outcome of this proceeding. I am only concerned about another station causing interference with my ability to listen to the station in the future.

2/21/18  
Date

John Bishop  
Signature

2825 SE LINCOLN  
Address

(503) 349-5383  
Telephone Number

### Declaration

I CHARLES SWEET do hereby declare, under penalty of perjury, that the following statements are true and correct.

I am a regular listener to KXRW-LP, Vancouver, WA on FM frequency 99.9. I usually listen to KXRW-LP at the following location:

MT. TABOR PARK, PORTLAND, SE 60<sup>TH</sup> & LINCOLN, HOME, CAR

I understand the FCC is considering the grant of an application for a new station on 99.9 in Portland, Oregon which could interfere with my ability to listen to KXRW-LP in the future.

I object to the operation of a new station which would interfere with KXRW-LP at my place of residence and/or in my car.

I have no personal or business connection with KXRW-LP or with Media Institute for Social Change (KXRW-LP licensee), nor connected with employees of KXRW-LP. I have no stake in the outcome of this proceeding. I am only concerned about another station causing interference with my ability to listen to the station in the future.

2/22/18

Date

Charles Sweet

Signature

2026 SE 28<sup>TH</sup> PL. 97214

Address

(503) 701-2183

Telephone Number

***Declaration***

I Jahan Djalali do hereby declare, under penalty of perjury, that the following statements are true and correct.

I am a regular listener to KXRW-LP, Vancouver, WA on FM frequency 99.9. I usually listen to KXRW-LP at the following location:

1828 SE Morrison, Portland Oregon 97214


I understand the FCC is considering the grant of an application for a new station on 99.9 in Portland, Oregon which could interfere with my ability to listen to KXRW-LP in the future.

I object to the operation of a new station which would interfere with KXRW-LP at my place of residence and/or in my car.

I have no personal or business connection with KXRW-LP or with Media Institute for Social Change (KXRW-LP licensee), nor connected with employees of KXRW-LP. I have no stake in the outcome of this proceeding. I am only concerned about another station causing interference with my ability to listen to the station in the future.

2/23/18

Date

  
Signature

1828 SE Morrison St.

Address

360-305-2556

Telephone Number

### **Declaration**

I Christine Rutan do hereby declare, under penalty of perjury, that the following statements are true and correct.

I am a regular listener to KXRW-LP, Vancouver, WA on FM frequency 99.9. I usually listen to KXRW-LP at the following location:

501 N Dixon St. Portland, OR 97227

I understand the FCC is considering the grant of an application for a new station on 99.9 in Portland, Oregon which could interfere with my ability to listen to KXRW-LP in the future.

I object to the operation of a new station which would interfere with KXRW-LP at my place of residence and/or in my car.

I have no personal or business connection with KXRW-LP or with Media Institute for Social Change (KXRW-LP licensee), nor connected with employees of KXRW-LP. I have no stake in the outcome of this proceeding. I am only concerned about another station causing interference with my ability to listen to the station in the future.

2/14/2018

Date

Signature

501 N. Dixon St., Portland, OR 97227

Address

913-667-9328

Telephone Number



### Declaration

I Robin Kim do hereby declare, under penalty of perjury, that the following statements are true and correct.

I am a regular listener to KXRW-LP, Vancouver, WA on FM frequency 99.9. I usually listen to KXRW-LP at the following location:

3562 SE Harrison St. Apt 15 Portland, OR 97214  
+ in car

I understand the FCC is considering the grant of an application for a new station on 99.9 in Portland, Oregon which could interfere with my ability to listen to KXRW-LP in the future.

I object to the operation of a new station which would interfere with KXRW-LP at my place of residence and/or in my car.

I have no personal or business connection with KXRW-LP or with Media Institute for Social Change (KXRW-LP licensee), nor connected with employees of KXRW-LP. I have no stake in the outcome of this proceeding. I am only concerned about another station causing interference with my ability to listen to the station in the future.

Date

Robin Kim

Digitally signed by Robin Kim  
DN: cn=Robin Kim, o=o.s.  
email=lightstrob@lightstrob.com, c=US  
Date: 2018.02.24 16:20:58 -08'00'

Signature

3562 SE Harrison St.  
Address Apt 15  
Portland, OR 97214  
714-357-9217

Telephone Number

**Declaration**

I Joel Yacoby do hereby declare, under penalty of perjury, that the following statements are true and correct.

I am a regular listener to KXRW-LP, Vancouver, WA on FM frequency 99.9. I usually listen to KXRW-LP at the following location:

520 SW Broadway Portland, OR 97205 and in my vehicle

I understand the FCC is considering the grant of an application for a new station on 99.9 in Portland, Oregon which could interfere with my ability to listen to KXRW-LP in the future.

I object to the operation of a new station which would interfere with KXRW-LP at my place of residence and/or in my car.

I have no personal or business connection with KXRW-LP or with Media Institute for Social Change (KXRW-LP licensee), nor connected with employees of KXRW-LP. I have no stake in the outcome of this proceeding. I am only concerned about another station causing interference with my ability to listen to the station in the future.

2/24/18  
Date

[Signature]  
Signature

6922 NE 66th St. Vancouver, WA 98661  
Address

503 290 9980  
Telephone Number

**Declaration**

I Michael Heald do hereby declare, under penalty of perjury, that the following statements are true and correct.

I am a regular listener to KXRW-LP, Vancouver, WA on FM frequency 99.9. I usually listen to KXRW-LP at the following location:

800 NW 6th Ave, #254, Portland, OR 97209


I understand the FCC is considering the grant of an application for a new station on 99.9 in Portland, Oregon which could interfere with my ability to listen to KXRW-LP in the future.

I object to the operation of a new station which would interfere with KXRW-LP at my place of residence and/or in my car.

I have no personal or business connection with KXRW-LP or with Media Institute for Social Change (KXRW-LP licensee), nor connected with employees of KXRW-LP. I have no stake in the outcome of this proceeding. I am only concerned about another station causing interference with my ability to listen to the station in the future.

2.26.18

Date

  
Signature

800 NW 6th Ave, #254, Portland, OR 97209  
Address

503-936-5911  
Telephone Number

### ***Declaration***

I Malachi Graham do hereby declare, under penalty of perjury, that the following statements are true and correct.

I am a regular listener to KXRW-LP, Vancouver, WA on FM frequency 99.9. I usually listen to KXRW-LP at the following location:

703 NE 64th Ave. Portland, OR 97213

I understand the FCC is considering the grant of an application for a new station on 99.9 in Portland, Oregon which could interfere with my ability to listen to KXRW-LP in the future.

I object to the operation of a new station which would interfere with KXRW-LP at my place of residence and/or in my car.

I have no personal or business connection with KXRW-LP or with Media Institute for Social Change (KXRW-LP licensee), nor connected with employees of KXRW-LP. I have no stake in the outcome of this proceeding. I am only concerned about another station causing interference with my ability to listen to the station in the future.

2/14/18

Date

Malachi Graham

Signature

703 NE 64th Ave. Portland, OR 97213

Address

971-645-7527

Telephone Number

**Declaration**

I Karla Havermand do hereby declare, under penalty of perjury, that the following statements are true and correct.

I am a regular listener to KXRW-LP, Vancouver, WA on FM frequency 99.9. I usually listen to KXRW-LP at the following location:

at my house, in my truck

I understand the FCC is considering the grant of an application for a new station on 99.9 in Portland, Oregon which could interfere with my ability to listen to KXRW-LP in the future.

I object to the operation of a new station which would interfere with KXRW-LP at my place of residence and/or in my car.

I have no personal or business connection with KXRW-LP or with Media Institute for Social Change (KXRW-LP licensee), nor connected with employees of KXRW-LP. I have no stake in the outcome of this proceeding. I am only concerned about another station causing interference with my ability to listen to the station in the future.

2-9-18

Date

K

Signature

4427 NE 35th Pl

Address

503-313-2507

Telephone Number

**Declaration**

I Karla Haverman do hereby declare, under penalty of perjury, that the following statements are true and correct.

I am a regular listener to KXRW-LP, Vancouver, WA on FM frequency 99.9. I usually listen to KXRW-LP at the following location:

at my house, in my truck

I understand the FCC is considering the grant of an application for a new station on 99.9 in Portland, Oregon which could interfere with my ability to listen to KXRW-LP in the future.

I object to the operation of a new station which would interfere with KXRW-LP at my place of residence and/or in my car.

I have no personal or business connection with KXRW-LP or with Media Institute for Social Change (KXRW-LP licensee), nor connected with employees of KXRW-LP. I have no stake in the outcome of this proceeding. I am only concerned about another station causing interference with my ability to listen to the station in the future.

2-9-18

Date

Karla Haverman

Signature

4427 NE 35th Pl 97211

Address

503-313-2507

Telephone Number

**Declaration**

I JOSEPH FRACEY do hereby declare, under penalty of perjury, that the following statements are true and correct.

I am a regular listener to KXRW-LP, Vancouver, WA on FM frequency 99.9. I usually listen to KXRW-LP at the following location:

5316 NE 40TH AVE PORTLAND, OR, 97211

I understand the FCC is considering the grant of an application for a new station on 99.9 in Portland, Oregon which could interfere with my ability to listen to KXRW-LP in the future.

I object to the operation of a new station which would interfere with KXRW-LP at my place of residence and/or in my car.

I have no personal or business connection with KXRW-LP or with Media Institute for Social Change (KXRW-LP licensee), nor connected with employees of KXRW-LP. I have no stake in the outcome of this proceeding. I am only concerned about another station causing interference with my ability to listen to the station in the future.

2/13/2017

Date

Signature

Joseph M. Fracey  
5316 NE 40th AVE, PORTLAND, OR, 97211

Address

(503) 367 1627

Telephone Number

### **Declaration**

I GRAY GANAWAY do hereby declare, under penalty of perjury, that the following statements are true and correct.

I am a regular listener to KXRW-LP, Vancouver, WA on FM frequency 99.9. I usually listen to KXRW-LP at the following location:

HOME, CAR, + OFFICE

I understand the FCC is considering the grant of an application for a new station on 99.9 in Portland, Oregon which could interfere with my ability to listen to KXRW-LP in the future.

I object to the operation of a new station which would interfere with KXRW-LP at my place of residence and/or in my car.

I have no personal or business connection with KXRW-LP or with Media Institute for Social Change (KXRW-LP licensee), nor connected with employees of KXRW-LP. I have no stake in the outcome of this proceeding. I am only concerned about another station causing interference with my ability to listen to the station in the future.

2/21/10  
Date

GRAY GANAWAY  
Signature

5441 NE Cesar Chavez Blvd.  
Portland, OR 97211  
Address

971-409-4195  
Telephone Number



**Declaration**

I Markie Johansen do hereby declare, under penalty of perjury, that the following statements are true and correct.

I am a regular listener to KXRW-LP, Vancouver, WA on FM frequency 99.9. I usually listen to KXRW-LP at the following location:

7934 NE Schuyler St, Portland, OR 97213

I understand the FCC is considering the grant of an application for a new station on 99.9 in Portland, Oregon which could interfere with my ability to listen to KXRW-LP in the future.

I object to the operation of a new station which would interfere with KXRW-LP at my place of residence and/or in my car.

I have no personal or business connection with KXRW-LP or with Media Institute for Social Change (KXRW-LP licensee), nor connected with employees of KXRW-LP. I have no stake in the outcome of this proceeding. I am only concerned about another station causing interference with my ability to listen to the station in the future.

2/24/2018

Date



Signature

7934 NE Schuyler St, Portland, OR 97213

Address

360-991-2966

Telephone Number

**Declaration**

I, Keri Wosypka, do hereby declare, under penalty of perjury, that the following statements are true and correct.

I am a regular listener to KXRW-LP, Vancouver, WA on FM frequency 99.9. I usually listen to KXRW-LP at the following location:

Ground Home and in car

I understand the FCC is considering the grant of an application for a new station on 99.9 in Portland, Oregon which could interfere with my ability to listen to KXRW-LP in the future.

I object to the operation of a new station which would interfere with KXRW-LP at my place of residence and/or in my car.

I have no personal or business connection with KXRW-LP or with Media Institute for Social Change (KXRW-LP licensee), nor connected with employees of KXRW-LP. I have no stake in the outcome of this proceeding. I am only concerned about another station causing interference with my ability to listen to the station in the future.

2/25/18  
Date

Keri Wosypka  
Signature

13806 SE 20th Circle  
Address Vancouver WA  
98683

360 721 2831  
Telephone Number

**Declaration**

I MAR COSIFCID do hereby declare, under penalty of perjury, that the following statements are true and correct.

I am a regular listener to KXRW-LP, Vancouver, WA on FM frequency 99.9. I usually listen to KXRW-LP at the following location:

Seasons Sport & Salon and in my car  
where I work

I understand the FCC is considering the grant of an application for a new station on 99.9 in Portland, Oregon which could interfere with my ability to listen to KXRW-LP in the future.

I object to the operation of a new station which would interfere with KXRW-LP at my place of residence and/or in my car.

I have no personal or business connection with KXRW-LP or with Media Institute for Social Change (KXRW-LP licensee), nor connected with employees of KXRW-LP. I have no stake in the outcome of this proceeding. I am only concerned about another station causing interference with my ability to listen to the station in the future.

2-26-15  
Date

MAR COSIFCID  
Signature

603 S.E. 116<sup>TH</sup> AVE Vancouver, WA  
Address 98683

360-609-0893  
Telephone Number

**Declaration**

I Shaun W. Tanner do hereby declare, under penalty of perjury, that the following statements are true and correct.

I am a regular listener to KXRW-LP, Vancouver, WA on FM frequency 99.9. I usually listen to KXRW-LP at the following location:

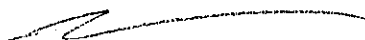
in car

I understand the FCC is considering the grant of an application for a new station on 99.9 in Portland, Oregon which could interfere with my ability to listen to KXRW-LP in the future.

I object to the operation of a new station which would interfere with KXRW-LP at my place of residence and/or in my car.

I have no personal or business connection with KXRW-LP or with Media Institute for Social Change (KXRW-LP licensee), nor connected with employees of KXRW-LP. I have no stake in the outcome of this proceeding. I am only concerned about another station causing interference with my ability to listen to the station in the future.

2-10-18  
Date

  
Signature

1000 SE 166th Ave Vancouver, WA 98683  
Address

360-723-8248  
Telephone Number

**Declaration**

I Diana Perez do hereby declare, under penalty of perjury, that the following statements are true and correct.

I am a regular listener to KXRW-LP, Vancouver, WA on FM frequency 99.9. I usually listen to KXRW-LP at the following location:

Vancouver, WA

I understand the FCC is considering the grant of an application for a new station on 99.9 in Portland, Oregon which could interfere with my ability to listen to KXRW-LP in the future.

I object to the operation of a new station which would interfere with KXRW-LP at my place of residence and/or in my car.

I have no personal or business connection with KXRW-LP or with Media Institute for Social Change (KXRW-LP licensee), nor connected with employees of KXRW-LP. I have no stake in the outcome of this proceeding. I am only concerned about another station causing interference with my ability to listen to the station in the future.

2/12/18  
Date

Diana Perez  
Signature

17116 SE Evergreen Hwy  
Address Vancouver, WA 98683

360-910-8493  
Telephone Number

### Declaration

I Merridy M. Daniel do hereby declare, under penalty of perjury, that the following statements are true and correct.

I am a regular listener to KXRW-LP, Vancouver, WA on FM frequency 99.9. I usually listen to KXRW-LP at the following location:

2106 SE 134<sup>th</sup> Ave, Vancouver, WA 98683

I understand the FCC is considering the grant of an application for a new station on 99.9 in Portland, Oregon which could interfere with my ability to listen to KXRW-LP in the future.

I object to the operation of a new station which would interfere with KXRW-LP at my place of residence and/or in my car.

I have no personal or business connection with KXRW-LP or with Media Institute for Social Change (KXRW-LP licensee), nor connected with employees of KXRW-LP. I have no stake in the outcome of this proceeding. I am only concerned about another station causing interference with my ability to listen to the station in the future.

02-12-2018  
Date

Merridy M. Daniel  
Signature

2106 SE 134<sup>th</sup> Ave Vancouver WA  
Address 98683

7706012923/7703542156  
Telephone Number

**Declaration**

I ELINORE BRADLEY do hereby declare, under penalty of perjury, that the following statements are true and correct.

I am a regular listener to KXRW-LP, Vancouver, WA on FM frequency 99.9. I usually listen to KXRW-LP at the following location:

in car

I understand the FCC is considering the grant of an application for a new station on 99.9 in Portland, Oregon which could interfere with my ability to listen to KXRW-LP in the future.

I object to the operation of a new station which would interfere with KXRW-LP at my place of residence and/or in my car.

I have no personal or business connection with KXRW-LP or with Media Institute for Social Change (KXRW-LP licensee), nor connected with employees of KXRW-LP. I have no stake in the outcome of this proceeding. I am only concerned about another station causing interference with my ability to listen to the station in the future.

2-11-18  
Date

Elinore Bradley  
Signature

14505 SE 28<sup>th</sup> St. Vanc. 98683  
Address

360-944-7838  
Telephone Number

### **Declaration**

I LOUIS MARTEBY do hereby declare, under penalty of perjury, that the following statements are true and correct.

I am a regular listener to KXRW-LP, Vancouver, WA on FM frequency 99.9. I usually listen to KXRW-LP at the following location:

IN MY CAR WHILE DRIVING

I understand the FCC is considering the grant of an application for a new station on 99.9 in Portland, Oregon which could interfere with my ability to listen to KXRW-LP in the future.

I object to the operation of a new station which would interfere with KXRW-LP at my place of residence and/or in my car.

I have no personal or business connection with KXRW-LP or with Media Institute for Social Change (KXRW-LP licensee), nor connected with employees of KXRW-LP. I have no stake in the outcome of this proceeding. I am only concerned about another station causing interference with my ability to listen to the station in the future.

12 FEB 2018  
Date

  
Signature

806 NE 122ND AVE. VANCOUVER, WA  
Address 98684

360-254-3116  
Telephone Number



**Declaration**

I TERAH PITCHFORD do hereby declare, under penalty of perjury, that the following statements are true and correct.

I am a regular listener to KXRW-LP, Vancouver, WA on FM frequency 99.9. I usually listen to KXRW-LP at the following location:

15200 NE 7th St VANCOUVER, WA 98684

I understand the FCC is considering the grant of an application for a new station on 99.9 in Portland, Oregon which could interfere with my ability to listen to KXRW-LP in the future.

I object to the operation of a new station which would interfere with KXRW-LP at my place of residence and/or in my car.

I have no personal or business connection with KXRW-LP or with Media Institute for Social Change (KXRW-LP licensee), nor connected with employees of KXRW-LP. I have no stake in the outcome of this proceeding. I am only concerned about another station causing interference with my ability to listen to the station in the future.

2-12-18

Date

Terah Pitchford

(Signature)

15200 NE 7th St  
Address VANCOUVER, WA 98684

360 910 3935  
Telephone Number

### **Declaration**

I Robert Frisina do hereby declare, under penalty of perjury, that the following statements are true and correct.

I am a regular listener to KXRW-LP, Vancouver, WA on FM frequency 99.9. I usually listen to KXRW-LP at the following location:


710 NE 149th Ave Vancouver, WA 98684

I understand the FCC is considering the grant of an application for a new station on 99.9 in Portland, Oregon which could interfere with my ability to listen to KXRW-LP in the future.

I object to the operation of a new station which would interfere with KXRW-LP at my place of residence and/or in my car.

I have no personal or business connection with KXRW-LP or with Media Institute for Social Change (KXRW-LP licensee), nor connected with employees of KXRW-LP. I have no stake in the outcome of this proceeding. I am only concerned about another station causing interference with my ability to listen to the station in the future.

2/12/18  
Date

  
Signature

710 NE 149th Ave Vancouver WA 98684  
Address

360-721-9964  
Telephone Number